

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JUSTIN ERNEST RIGGS,**

**Defendant**

**Criminal No. SAG-23-022**

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**MOTION TO FILE SENTENCING MEMORANDUM UNDER SEAL**

Justin Riggs, through his attorneys, James Wyda, Federal Public Defender for the District of Maryland, and Andrew Szekely and Eric Pilch, Assistant Federal Public Defenders, respectfully moves this Honorable Court for an order placing under the Court's seal the Proposed Sealed Document (Sentencing Memorandum and Exhibits), to be filed by Mr. Riggs' in this case. In support of this Motion, Mr. Riggs states as follows:

1. A sentencing hearing is scheduled for June 5, 2025.
2. Today counsel is filing with the Court a Sentencing Memorandum and supporting exhibits for consideration at sentencing.
3. The Sentencing Memorandum, and attached exhibits, contain sensitive information regarding Mr. Riggs, and his family, including medical information. This information is of a type covered by privacy laws which protect against disclosure to unauthorized persons or the public in general.
4. No reasonable alternatives to sealing the sentencing memorandum and exhibits are available.

5. Counsel intends to serve the government and the United States Probation Office with copies of the Proposed Sealed Document at the time that it is filed.

WHEREFORE, Mr. Riggs respectfully requests that the Sentencing Memorandum and its supporting exhibits to be filed immediately following this motion, be placed under the Court's seal.

Respectfully submitted,

JAMES WYDA  
Federal Public Defender

\_\_\_\_\_/s/  
ANDREW SZEKELY  
ERIC PILCH  
Assistant Federal Public Defenders  
100 S. Charles Street  
Tower II, 9th Floor  
Baltimore, MD 21201  
(410) 962-3692  
Email: [andrew\\_szekely@fd.org](mailto:andrew_szekely@fd.org)  
[eric\\_pilch@fd.org](mailto:eric_pilch@fd.org)